

July 7, 2003

Ms. Joyce Kuykendall
U.S. Army Soldier and Biological Chemical Command
AMSSB-RCB-RS
5183 Black Hawk Road
Aberdeen Proving Ground, MD 21010-5423

SUBJECT: REPORT OF MEETING WITH THE ARMY CONCERNING A PROPOSED
LICENSE AMENDMENT FOR THE JEFFERSON PROVING GROUND
FACILITY

Dear Ms. Kuykendall:

Enclosed is a report of the July 1, 2003, meeting between staff of the U.S. Nuclear Regulatory Commission and representatives of the Army.

Please contact me at (301) 415-5869 if you have any questions.

Sincerely,
/RAI

Tom McLaughlin, Project Manager
Facilities Decommissioning Section
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure: Meeting Report

Docket No.: 040-08838
License No.: SUB-1435

cc: JPG Dist. List

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OFC	DCB		DCB	
NAME	T.McLaughlin		C. Craig	
DATE	07/07/03		07/07/03	

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MEETING REPORT

Date: Tuesday, July 1, 2003

Time: 1:00 PM to 3:00 PM

Place: U.S. Nuclear Regulatory Commission (NRC)
11545 Rockville Pike
Rockville, MD 20852
Room T-8A1

Purpose: To discuss a proposed license amendment for Jefferson Proving Ground

Attendees: See Attachment A

Background:

In a letter dated February 4, 2003, the U.S. Army made a contingent request for an alternate schedule for submittal of a Decommissioning Plan (DP) for the termination of the Jefferson Proving Ground (JPG) license SUB-1435. The letter stated that the unexploded ordnance (UXO) on site is a safety hazard. Therefore, the Army would not be able to provide site-specific data if required by the Nuclear Regulatory Commission (NRC) during the technical review of the current DP. The Army is developing a license amendment request for SUB-1435 that would create a 5-year renewable possession-only license for an indefinite time period. The NRC staff concluded that under the unique circumstances of this case, where the collection of data to complete the DP in itself could create personnel safety hazards, and the licensee—a federal agency—is a stable and durable entity that can provide access controls and monitoring in accordance with NRC's requirements, extending the requirement to submit a DP until the necessary data can be safely collected and models validated could be approved under 10 CFR 40.42(g)(2). The Army was then invited to participate in an open meeting at NRC headquarters to discuss the information that should be included in the proposed license amendment.

Discussion

The Army presented an outline of a revised Environmental Radiation Monitoring (ERM) Plan (Attachment B) as part of its proposed license amendment. The current ERM was established in 1984 and has limited rationale for its Standard Operating Procedures. The Army intends to review the historical monitoring data and action levels, and establish a current monitoring program using the data quality objective process. The revised ERM and proposed license amendment are scheduled to be submitted to NRC during the first week of August 2003. The Army will present the status of unexploded ordnance (UXO) cleanup during the 5-year license renewal process. It is possible that sometime in the future the Army will be able to collect site-specific data needed to validate off-site transport models without cleanup of the UXO.

The public then asked questions directed both at the Army and NRC. One question was whether the NUREG-0475 referenced in the current ERM has been updated. Another question was whether the Army was going to have scheduled monitoring and "targeted" monitoring during events such as burns or floods in the DU area. Members of the public encouraged sampling of other potential members of the human food chain such as small mammals and birds. The role of EPA at the site was extensively discussed as well as the Memorandum of Understanding between EPA and NRC. Another question

from the public was whether a fly over of the site using gamma spectroscopy to locate areas of DU was planned. The Army was also asked if its proposed license amendment would follow the guidance of as low as reasonably achievable (ALARA).

Action Items

1. Joyce Kuykendall will clarify the value for an action level for groundwater of 15 pCi/g listed in the Environmental Report submitted to NRC in June, 2003, and report the information to NRC.
2. Diane Henshel will contact the EPA representative (David Huber, 202-564-4878) who established a MCL for uranium in drinking water based on both kidney and radiation toxicity and report the information to Save the Valley.

Attachments:

- A. Meeting Attendees
- B. Proposed Outline of a Revised Environmental Radiation Monitoring Plan

MEETING ATTENDEES

Topic: Discussion of license amendment for JPG

Date: July 1, 2003

NAME	AFFILIATION	PHONE NUMBER
Thomas McLaughlin	NRC/NMSS/DWM/DCB	301-415-5869
Claudia Craig	NRC/NMSS/DWM/DCB	301-415-6602
Daniel Gillen	NRC/NMSS/DWM/DCB	301-415-7295
Tomeka Terry	NRC/NMSS/DWM/DCB	301-415-1488
Stephen Lewis	NRC/OGC	301-415-1684
James Lieberman	NRC/OGC	301-415-2746
Joyce Kuykendall	U.S. Army	410-436-7118
Paul Cloud	U.S. Army	410-436-2381
Richard Wakeling	U.S. Army	410-278-1113
Corinne Shia	SAIC	703-318-6993
Larry Deschaine	SAIC	706-724-5589
Peggy Vlerebome	Madison Courier	(call in to conference)
Richard Hill	Save the Valley	(call in to conference)
Mike Mullett	Save the Valley	(call in to conference)
Chuck Norris	Save the Valley	(call in to conference)
Karen Mason-Smith	IN State EPA	(call in to conference)
Tom Hull	Consultant to IN State EPA	(call in to conference)
Diane Henshel	Henshel and Associates	(call in to conference)
Jamie Dewitt	Henshel and Associates	(call in to conference)

SAMPLING PLAN FOR LICENSE SUB-1435

JEFFERSON PROVING GROUND

DRAFT

Submitted to:

**Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Washington, D.C.**

Prepared by:

**U.S. Department of Army
Soldier and Biological Chemical Command
Aberdeen Proving Ground**

June 2003

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¹ QC samples (equipment blank, trip blank, field duplicates, and field replicates) will be addressed and quantified in each of these sections.